

1 ROB BONTA  
2 Attorney General of California  
3 PAULA L. BLIZZARD (SBN 207920)  
4 Senior Assistant Attorney General  
5 MICHAEL W. JORGENSEN (SBN 201145)  
6 Supervising Deputy Attorney General  
7 BRIAN D. WANG (SBN 284490)  
8 CAROLYN D. JEFFRIES (SBN 319595)  
9 Deputy Attorneys General  
10 **OFFICE OF THE ATTORNEY GENERAL**  
11 **OF CALIFORNIA**  
12 455 Golden Gate Avenue, Suite 11000  
13 San Francisco, CA 94102-7004  
14 Telephone: (415) 510-4400  
15 Fax: (415) 703-5843  
16 E-mail: Paula.Blizzard@doj.ca.gov  
17 *Counsel for Plaintiff State of California*

11 Karma M. Giulianelli (SBN 184175)  
12 karma.giulianelli@bartlitbeck.com  
13 **BARTLIT BECK LLP**  
14 1801 Wewetta St., Suite 1200  
15 Denver, Colorado 80202  
16 Telephone: (303) 592-3100  
17 *Co-Lead Counsel for Consumer Plaintiffs in In re Google Play Consumer Antitrust Litigation*

Glenn D. Pomerantz (SBN 112503)  
glenn.pomerantz@mto.com  
**MUNGER, TOLLES & OLSON LLP**  
350 South Grand Avenue, Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 683-9100

Brian C. Rocca (SBN 221576)  
brian.rocca@morganlewis.com  
**MORGAN, LEWIS & BOCKIUS LLP**  
One Market, Spear Street Tower  
San Francisco, CA 94105-1596  
Telephone: (415) 442-1000  
*Counsel for Defendants Google LLC et al.*

Hae Sung Nam (*pro hac vice*)  
hnam@kaplanfox.com  
**KAPLAN FOX & KILSHEIMER LLP**  
850 Third Avenue  
New York, NY 10022  
Telephone.: (212) 687-1980

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 **IN RE GOOGLE PLAY STORE**  
20 **ANTITRUST LITIGATION**

21 THIS DOCUMENT RELATES TO:

22 *State of Utah et al. v. Google LLC et al.*,  
23 Case No. 3:21-cv-05227-JD

24 *In re Google Play Consumer Antitrust*  
25 *Litigation*, Case No. 3:20-cv-05761-JD

Case No. 3:21-md-02981-JD

**STIPULATED [PROPOSED] ORDER**  
**GRANTING STATES' UNOPPOSED**  
**ADMINISTRATIVE MOTION FOR AN**  
**EXTENSION OF TIME TO FILE**  
**SUPPLEMENTAL BRIEFING AND**  
**FOR AN ORDER DIRECTING**  
**GOOGLE TO DEPOSIT**  
**SETTLEMENT FUNDS INTO**  
**ESCROW**

Judge: Hon. James Donato

Case Nos. 3:21-md-02981-JD;  
3:21-cv-05227-JD; 3:20-cv-05761-JD

**STIPULATED [PROPOSED] ORDER GRANTING STATES' UNOPPOSED ADMINISTRATIVE MOTION**  
**FOR AN EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEFING AND FOR AN ORDER**  
**DIRECTING GOOGLE TO DEPOSIT SETTLEMENT FUNDS INTO ESCROW**

Plaintiffs in *State of Utah et al. v. Google LLC et al.*, Case No. 3:21-cv-05227-JD (“States”), Counsel for the class this Court had originally certified in *In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761- JD (“Consumer Counsel”), and Defendants Alphabet Inc., Google LLC, Google Ireland Limited, Google Commerce Limited, Google Asia Pacific Pte. Limited, and Google Payment Corp. (“Google”) (collectively, the “Settling Parties”), for reasons stated in the concurrently filed Administrative Motion for an Extension of Time to File Supplemental Briefing and for an Order Directing Google to Deposit Settlement Funds into Escrow, respectfully request from the Court (i) a three-week extension to the filing date for the supplemental briefing requested in the Court’s February 26, 2024 minute order, No. 21-cv-5227, ECF No. 543, and (ii) an order directing Google to deposit Settlement Funds into escrow pending the Court’s decision regarding notice dissemination.

The Settling Parties stipulate that the capitalized terms in this Stipulated [Proposed] Order have the meanings ascribed to them in the Settlement Agreement, attached as Exhibit A to the Declaration of Paula L. Blizzard in support of the Motion to Give Notice of Proposed *Parens Patriae* Settlement filed on December 18, 2023. No. 21-cv-5227, ECF No. 522-2.

**NOW, THEREFORE, IT IS STIPULATED AND AGREED, SUBJECT TO THE APPROVAL OF THE COURT:**

1. The States and Google will file the supplemental briefs directed by the Court’s February 26, 2024 minute order, Dkt. No. 944 in Case No. 21-md-02981, by April 17, 2024.
2. Within fifteen (15) days of the issuance of this Stipulated [Proposed] Order, Google shall transfer \$1,000,000 into the Settlement Fund Escrow Account for settlement notice and administration.
3. Within forty-five (45) days of the issuance of this Stipulated [Proposed] Order, Google shall transfer the additional sum of \$629,000,000 into the Settlement Fund Escrow Account.
4. Within forty-five (45) of the issuance of this Stipulated [Proposed] Order, Google shall

transfer \$70,000,000 into the States' Monetary Fund Escrow Account.

DATED: March 15, 2024

Respectfully submitted,

**OFFICE OF THE CALIFORNIA  
ATTORNEY GENERAL**

By: /s/ Paula L. Blizzard  
Paula L. Blizzard  
*Counsel for the Plaintiff States*

**BARTLIT BECK LLP**  
Karma M. Giulianelli  
**KAPLAN FOX & KILSHEIMER LLP**  
Hae Sung Nam

By: /s/ Karma M. Giulianelli  
Karma M. Giulianelli  
*Co-Lead Counsel for Consumer Plaintiffs in In  
re Google Play Consumer Antitrust Litigation*

**MUNGER, TOLLES & OLSON LLP**  
Glenn D. Pomerantz  
Kuruvilla Olasa  
Jonathan I. Kravis  
Justin P. Raphael

By: /s/ Glenn D. Pomerantz  
Glenn D. Pomerantz

**MORGAN, LEWIS & BOCKIUS LLP**  
Brian C. Rocca  
Sujal J. Shah  
Michelle Park Chiu  
Minna Lo Naranjo

By: /s/ Sujal J. Shah  
Sujal J. Shah

*Counsel for Defendants Google LLC et al.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_  
United States District Judge

**E-FILING ATTESTATION**

I, Brian Wang, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each signatory identified above has concurred in this filing.

/s/ Brian Wang